



ROY C. BROOKS
County Commissioner
Precinct No. 1

October 13, 2009

Re: Broadband Industry Practices (WC Docket No. 07-52)

Chairman Julius Genachowski
Commissioner Michael J. Copps
Commissioner Robert McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker

My name is Roy C. Brooks and I represent Precinct One on the Tarrant County Commissioner's Court. Prior to being elected Commissioner for Precinct One, I served as its Precinct Administrator for 14 years and served 6 years on the Forest Hill City Council. I currently serve on the Board of Directors of National Association of Counties as well as the National Association of Counties Health Steering Committee. I am the Past President of the National Association of Black County Officials, which represents both elected and appointed county officials across America, and Past President of the Fort Worth/Tarrant County Minority Leaders and Citizens Council.

One of the four major initiatives I've undertaken as County Commissioner has been to improve our E-Government services, to achieve more Internet and customer-oriented delivery of services. This of course means that our citizens need access to the Internet in order to take advantage of our expanding E-Government offerings.

That's why I am commenting on this docket concerning Broadband Industry Practices. Nothing in my experience of public service or private life suggests that the broadband industry prevents people from accessing information or applications of their choosing online ... except not having access to the Internet in the first place!

There are a variety of factors which cause people not to have broadband Internet access at home. Obvious factors are low income, lack of adequate housing, and a belief that broadband access is not important or a necessity. Yet, most people in Texas have cell phones, not to mention growth in wireless laptops/netbooks, and the Internet can be accessed via those devices quite easily. Promoting wireless broadband is a very good way to get people online, even if they lack computers or broadband access at home.


Unfortunately, the FCC appears to be headed in the opposite direction, as this docket appears concerned with perceived, but largely unseen, efforts to keep consumers from fully utilizing their broadband connections. Many years of public service have taught me that anecdotal evidence of potential bad behavior is best dealt with on a case-by-case basis, not by enacting heavy-handed rules which end up blocking many good deeds in an effort to rein in a few bad ones.

I would much rather see the FCC try to promote more widespread deployment and adoption of broadband technologies. The best way for consumers to deal with a company's bad actions is to choose to buy services from someone else. In capital-intensive industries such as communications, the only way for a "someone else" to be there is if they are encouraged to risk the resources to enter the market. Network Neutrality rules do not encourage anyone to risk capital to enter the market.

I further have an issue with Network Neutrality on the grounds that the E-Government services we provide ought to have some priority. A citizen paying their taxes online deserves a prompt, 100% reliable transaction. As I understand Network Neutrality, at its philosophical core, a citizen's tax payment would have equal priority to someone downloading a silly YouTube video. Is that really what our National broadband policy should be?

Instead of trying to tackle a phantom problem, let's address the real problems of getting more broadband access to people who need it and ensure that everyone gets the secure, fast transactions they expect when dealing with their Government online.

Sincerely,



Roy C. Brooks